



June 24, 2009,

California State Rural Health Association (CSRHA) welcomes this opportunity to share its perspective of the impact of the proposed “meaningful use” guidelines on rural health providers within California. CSRHA represents rural hospitals, rural clinics, public health departments and other rural community based organizations throughout the State of California. Since 1996, we have been actively working to expand the ability of rural health providers to use the benefits of health information technology to expand access and improve the quality of care.

Based on the current rate of EHR and HIT adoption among rural providers in California, CSRHA believes that the current “meaningful use” guidelines are overly aggressive and could have the impact of marginalizing small and rural providers from the overall benefits of HIT. It is critical to account for the difference between the resources available to smaller, more rural providers and larger health systems within urban areas. To expect rural health providers to hold to the same time frame as larger urban facilities with more available resources is neither reasonable nor attainable in the current phasing template.

One major barrier to implementation of EHR systems /HIT in rural areas is the availability of broadband for health information exchange. Broadband still does not exist in many rural communities and implementing broadband connectivity and making it available it is often difficult. The Federal Communication Commission is currently investing over \$400 million to bring broadband to rural facilities throughout the nation and California alone will be spending over \$25 million to bring broadband to rural health providers over the next three years. This lack of

broadband capability will significantly impact the timeline of health information exchange implementation envisioned in the guidelines.

Another barrier is the lack of capital available to smaller rural facilities for the technology infrastructure to successfully implement EHR/HIT systems in their facilities. Many rural facilities must upgrade or implement basic technology infrastructure before they can install advanced EHR/HIT applications. This will markedly increase the time required to reach meaningful use of EHR/HIT systems. The cost of implementing these systems will also be higher for rural facilities because of the lack of proximity to technical services and expertise when compared to their urban counterparts. Incentive dollars should address the larger challenges that rural hospitals and clinics face.

Finally, it will take time to recruit and train technical personnel to implement the new EHR/HIT technologies in rural. Thousands of additional technical workers will be needed to support HIT applications in rural facilities around the country where such expertise is currently not available. The availability of trained staff will slow implementation of EHR/HIT systems nationwide, but particularly in rural areas.

The HIT Policy Committee should consider a tiered approach to “meaningful use” standards that recognize that rural organizations have vastly different capacities to successfully install and use advanced EHR/HIT systems. Rather than adopting a “one-size fits all” approach, the Policy Committee should develop standards that give rural organizations adequate time to effectively complete their more difficult implementation process. While it is important to set standards and goals to assist providers in making progress along a “meaningful use” continuum, it is not helpful to punish those providers who have a much more difficult task to meet ambitious and aggressive timelines that cannot be met by a majority of today’s rural health care providers.

Rural health providers play a pivotal role in bringing needed health care to underserved areas in California and around the nation. EHR systems and other advanced HIT will greatly improve efficiency and quality of care and must be provided in rural areas. CSRHA is hopeful that the Health Information Technology Policy Committee will take rural America's unique challenges into consideration.

**The California State Rural Health Association** is a statewide nonprofit advocacy organization working to promote an improved level of health and access to health services for rural Californians, to serve as a unified voice on rural issues, and to provide a forum for the exchange of information, ideas, and the development of rural health strategies.



3720 Folsom Blvd., Suite B | Sacramento, CA 95816 |  
T 916.453.0780 | [www.csrha.org](http://www.csrha.org)